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Andrew P. Bell abell@locksfawny

September 11, 2008

VIA E-MAIL

Hon. Paul Crotty United States District Court, Southern District of New York 500 Pearl Street, Room 735 New York, New York 10007

Re:

Price v. Porter Novelli, Inc., et al.

07 Civ. 5869(PAC)

Dear Judge Crotty:

We represent the plaintiff in the above-referenced FLSA putative collective action. This letter is submitted on behalf of both Plaintiffs and Defendants to request that this Court continue the present stay of the action pending settlement discussions and adjourn the date by which the parties are required to submit a briefing schedule to the court to October 30, 2008, as was ordered at the court conference held on July 17, 2008.

The parties completed discovery as per this Court's Case Management Order on July 31, 2008 and have been working diligently on reviewing and analyzing the data from the thousands of pages of discovery produced and the testimony of the many witnesses deposed in order to create reasonable settlement proposals. The work has taken longer than both parties expected, but nevertheless, the parties are planning to meet as soon as possible in order to discuss these proposals and settlement. Accordingly, the parties seek the extra time requested herein and believe that such time is necessary and warranted in order to accomplish and facilitate these settlement talks.

This is the first request for an extension of the stay. Thank you for your consideration of this request.

Respectfully submitted

Andrew P. Bell (AB

SEP 1 2 2000

cc:

Seth R. Lesser (via email)

John D. Shyer, Esq. (via email)

Amy S. Donovan, Esq. (via email)

ITED STATES DISTRICT JUDGE

PHILADELPHIA, PA CHERRY HILL, NJ MEDIA, PA